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	and Arjun V. Gururaj, M.D., a professional corporation	
7		DISTRICT COURT
8	DISTRICT OF NEVADA	
9		
10	BETH SANTORI,)	Case No. 2:21-cv-01960-JAD-DJA
11	Plaintiff,)	STIPULATION AND REQUEST FOR
	vs.	EXTENSION OF TIME FOR DEFENDANTS DR. ARJUN
12	DR. ARJUN GURURAJ, individually; ARJUN) V. GURURAJ, M.D., a professional corporation;)	GURURAJ AND ARJUN V. GURURAJ,
13	and NEVADÁ HEÁRT AND VASCULAR () (RESH) LLP,	M.D. TO RESPOND TO PLAINTIFF'S COMPLAINT
14	Defendants.	(First Request)
15)	, ,
16	The Parties, by and through their respective counsel of record, stipulate and request that this Court extend the time for Defendants Dr. Arjun Gururaj, individually, and Arjun V. Gururaj, M.D., a professional corporation (hereinafter collectively referred to as "Gururaj"), to respond to Plaintiff's Complaint, up to and including Thursday , January 20 , 2022 . In support of this Stipulation and	
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19	Request, the parties state as follows:	
20	Plaintiff served Defendants Gururaj with copies of the Summons and Complaint on	
21	November 13 and 15, 2021. The present deadline for Defendants Gururaj to respond to Plaintiff's	
22	Complaint is December 3 and 6, 2021.	
23	2. Counsel for both Plaintiff and Defendants Gururaj are currently discussing a potentia	
24	early resolution of this matter. While those discussions continue, counsel for both parties believe i	

1 would be prudent to conserve their respective resources and focus on determining whether this matter be resolved. Counsel for both parties have discussed and agreed to an extension of time for 2 Defendants Gururaj to respond to Plaintiff's Complaint. 3 3. This is the first request for an extension of time for Defendants Gururaj to respond to 4 Plaintiff's Complaint, and is not sought for any improper purpose or other reason of delay. This 5 extension is sought only to secure sufficient time to assess whether the parties' present discussions as 6 to a potential early resolution of this matter may be achieved. 7 WHEREFORE, the parties respectfully request that Defendants Gururaj be permitted an 8 extension of time, up to and including January 20, 2022, to respond to Plaintiff's Complaint. 9 DATED this 1st day of December 2021. HOLMAN LAW OFFICE KAMER ZUCKER ABBOTT 10 11 /s/ Kristina S. Holman /s/ Scott M. Abbott By: By: 12 Kristina S. Holman #3742 Scott M. Abbott #4500 8275 S. Eastern Avenue, Suite 215 Kaitlin H. Paxton #13625 13 Las Vegas, Nevada 89123 3000 West Charleston Blvd., Suite 3 Tel: (702) 614-4777 Las Vegas, Nevada 89102-1990 14 Fax: (702) 487-3128 Tel: (702) 259-8640 Fax: (702) 259-8646 15 Jay D. Ellwanger Ellwanger Law LLLP Attorneys for Defendants Gururaj 16 8310 N. Capital of Texas Highway, Ste. 190 Austin, Texas 78731 17 Tel: (737) 808-2260 18 Attorneys for Plaintiff 19 20 **ORDER** 21 IT IS SO ORDERED. 22 $_{
m DATED:}$ December 2, 2021 23 UNITED STATES MAGISTRATE JUDGE 24